



Department of Energy
Western Area Power Administration
P.O. Box 281213
Lakewood, CO 80228-8213

ORIGINAL

FILED
OFFICE OF THE SECRETARY
00 NOV 20 AM 11:32

November 17, 2000

Honorable David Boergers, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Avista Corporation, Bonneville Power
Administration, Idaho Power Company, Montana
Power Company, Nevada Power Company, PacifiCorp,
Portland General Electric Company, Puget Sound
Energy, Inc., Sierra Pacific Power Company
FERC Docket No. RT01-35-000

Dear Secretary Boergers:

Enclosed for filing with the Commission is an original and
16 copies of the Western Area Power Administration's Motion
to Intervene in this proceeding. Please time stamp two
copies and return them to me in the enclosed self-addressed
stamped envelope. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Koji Kawamura", is written over a horizontal line.

Koji Kawamura
P. June Taylor
Attorneys
Office of General Counsel

Enclosures

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FERC DOCKETED
NOV 20 2000

IN THE UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

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)	
Avista Corporation,)	Docket No. RT01-35-000
Bonneville Power)	
Administration,)	
Idaho Power Company,)	
Montana Power Company,)	
Nevada Power Company,)	
PacifiCorp,)	
Portland General Electric)	
Company,)	
Puget Sound Energy, Inc.,)	
Sierra Pacific Power)	
Company.)	
)	

**MOTION TO INTERVENE BY THE
WESTERN AREA POWER
ADMINISTRATION**

The Western Area Power Administration (Western), an agency of the U.S. Department of Energy (DOE), files its Motion to Intervene pursuant to the Commission's Notice of Filing dated October 24, 2000, and Rule 214 of the Federal Energy Regulatory Commission's Rules and Regulations (18 C.F.R. § 385.214). The comments contained herein are Western's and do not necessarily reflect the views of the DOE.

I. BACKGROUND

On October 23, 2000, Avista Corporation, Bonneville Power Administration, Idaho Power Company, Montana Power Company, Nevada Power Company, PacifiCorp, Portland General Electric Company, Puget Sound Energy, Inc., and Sierra Pacific Power Company (collectively, the filing utilities) filed a "Supplemental Compliance Filing and Request for Declaratory Order Pursuant to Order 2000" in accordance with 18 C.F.R. § 385.207 (a)(2). The filing utilities propose to form a regional transmission organization (referred to as RTO West) that complies with the requirements of the Commission's Order 2000. The filing also requests an expedited declaratory order from the Commission that certain aspects of the proposal, including the proposed governance documents and scope and configuration of RTO West, are in accordance with applicable requirements under Order 2000.

II. WESTERN HAS AN INTEREST THAT MAY BE DIRECTLY AFFECTED BY THE OUTCOME OF THESE PROCEEDINGS.

Western has an interest that may be directly affected by the outcome in these proceedings. Western annually markets and transmits approximately 10,000 megawatts of power from 55 hydropower plants. Western's service area

covers 1.3 million square miles in 15 Western states. Western provides power to 643 wholesale customers, including 284 municipalities, 58 cooperatives, 17 public utility and 47 irrigation districts; 50 Federal and 55 state agencies; 24 investor-owned utilities and 30 marketers who purchase surplus non-firm power. These customers in turn provide retail electric service to consumers in Arizona, California, Colorado, Iowa, Kansas, Minnesota, Montana, Nebraska, Nevada, New Mexico, North Dakota, South Dakota, Texas, Utah, and Wyoming.

III. COMMENTS

Western consists of four regional offices and the Colorado River Storage Project (CRSP) Management Center. With its vast geographic organization, Western's various offices are enmeshed and subject to the evolving regional systems, including the California Independent System Operator (CAISO), Desert STAR and Mid Area Power Pool, Midwest Independent System Operator (MISO). Western's concerns with the formation of RTO West rests with potential interface problems arising from Western's projects throughout the West and the proposed RTO West.

For example, in Western's Sierra Nevada Region (SNR), the Washoe Project would be located in the proposed RTO West control area, however, the Central Valley Project (CVP) is in the CAISO's control area. Consequently, Western's customers and resources of SNR would be subject to both control areas and their differing, if not conflicting, protocols. In addition, potential interface issues could arise as a result of SNR's direct interfaces at both the Pacific AC Intertie (PACI) and California Oregon Transmission Project (COTP) with the proposed RTO West.

It has been suggested that RTO West would include Canyon Ferry and Yellowtail Powerplants of Western's Upper Great Plains Region (UGPR). Further, at least one rough RTO West map suggests that UGPR transmission facilities in Montana would also be included. UGPR and the customers who take delivery from Canyon Ferry and Fort Peck could ultimately require network service from the RTO West. As a load-serving entity, UGPR is concerned with the rates charged for service within Montana, RTO West entry fees, and any existing firm transmission rights that should be recognized on the RTO West transmission system.

The CRSP service territory includes southern Nevada, Utah, and western Wyoming. The CRSP does not have its own transmission system in these areas. CRSP firm electric service customers in southern Nevada make their own transmission arrangements from the end of the CRSP system. Typically, this means obtaining transmission over Western's neighboring Parker-Davis system in Arizona and then over non-Federal systems in southern Nevada, systems that are proposed to be included in the RTO West control area. In Utah the Federal Government did not build its own transmission system. Following negotiations with Utah Power & Light (now PacifiCorp, and who opposed a Federal transmission system in Utah) for contracts providing transmission to all CRSP firm electric service customer load in Utah, the CRSP dropped plans for its own system. CRSP's transmission contract with PacifiCorp is also vital in that it allows the CRSP to integrate the output of the Bureau of Reclamation's Deer Creek Power Plant which is interconnected with PacifiCorp's transmission system and located in the PacifiCorp control area. Therefore, as with other Western projects, the fact that a good portion of the CRSP service territory may well fall in the RTO West control area raises numerous seams issues. More

importantly, CRSP's transmission contracts with PacifiCorp highlights the fact that RTO West design must be such that existing contracts are honored.

Western's Desert Southwest Region (DSWR) has transmission facilities in southern Nevada that are part of the Boulder Canyon Project and Parker-Davis Project. Western DSWR is concerned about the effect the formation of RTO West will have on DSWR service to customers of these Projects in southern Nevada.

IV. SERVICE INFORMATION

Pursuant to Rule 203 (18 C.F.R. § 385.203), Western further requests all correspondence, pleadings, and other communications concerning this filing be served upon:

Koji Kawamura
P. June Taylor
Office of General Counsel
Western Area Power Administration
P.O. Box 281213
12155 W. Alameda Pkwy
Lakewood, CO 80228-8213

Since Western's regional offices all have varying interests in this filing, pursuant to 18 C.F.R. § 385.203(b)(3), Western also requests the inclusion of the following on the official service list and a waiver of Rule 203(b)(3):

Jerry W. Toenyas, Regional Manager
Western Area Power Administration
Sierra Nevada Customer Service Region
114 Parkshore Drive
Folsom, CA 95630-4710

Robert J. Harris, Power Marketing Manager
Western Area Power Administration
Upper Great Plains Customer Service Region
P.O. Box 35800
Billings, MT 59107-5800

Joel K. Bladow, Regional Manager
Western Area Power Administration
Rocky Mountain Customer Service Region
P.O. Box 3700
Loveland, CO 80539-3003

David Sabo, CRSP Management Center Manager
Colorado River Storage Project Management Center
P.O. Box 11606
Salt Lake City, UT 84147-0606

J. Tyler Carlson, Regional Manager
Desert Southwest Customer Service Region
P.O. Box 6457
Phoenix, AZ 85005-6457


IV. CONCLUSION AND PRAYER FOR RELIEF

Western has an interest in this proceeding and
Western's interest is not adequately represented by any
other party.

WHEREFORE, Western requests that the Commission grant its Motion to Intervene in the docket.

Dated this 17th day of November 2000.

Respectfully submitted,




Koji Kawamura
P. June Taylor
Office of General Counsel
Western Area Power Administration
(720) 962-7010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Lakewood, Colorado, this 17th day of November 2000.

By 

Tami Pelton
Office of General Counsel
Western Area Power Administration
P.O. Box 281213
Lakewood, CO 80228-8213
(720) 962-7010
(720) 962-7009 (fax)